
UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

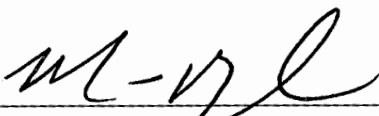
UNITED STATES OF AMERICA : **CRIMINAL COMPLAINT**
 :
 v. : Honorable Michael A. Hammer
 :
 JOE VEGA : Mag. No. 20-10063
 :

I, Special Agent Matthew Barile, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief:

SEE ATTACHMENT A

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

SEE ATTACHMENT B



Matthew Barile, Special Agent
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,
on February 13, 2020, at Newark, New Jersey



HONORABLE MICHAEL A. HAMMER
United States Magistrate Judge

ATTACHMENT A

COUNT ONE

(Felon in Possession of Firearm)

On or about November 25, 2019, in Passaic County, in the District of New Jersey and elsewhere, the defendant,

JOE VEGA,

knowing he had previously been convicted of at least one crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm in and affecting commerce, namely, one .40 caliber handgun, bearing serial number XD312433, loaded with six (6) rounds of ammunition.

In violation of Title 18, United States Code, Section 922(g)(1).

ATTACHMENT B

I, Matthew Barile, am a Special Agent with the Federal Bureau of Investigation. I am fully familiar with the facts set forth herein based on my own investigation, my conversations with other law enforcement officers, and my review of reports, documents, and photographs of the evidence. Where statements of others are related herein, they are related in substance and part. Because this Complaint is being submitted for a limited purpose, I have not set forth each and every fact that I know concerning this investigation. Where I assert that an event took place on a particular date and time, I am asserting that it took place on or about the date and time alleged.

1. On or about November 25, 2019, at approximately 10:21 p.m., an off-duty police officer ("WITNESS") was approaching the intersection of Monroe Street and Market Street in Passaic when WITNESS observed a gray Toyota Sequoia (the "Toyota") making a left-hand turn from Market onto Monroe Street. As the Toyota passed WITNESS's vehicle, WITNESS observed the driver of the vehicle, later identified as defendant Joe Vega ("VEGA"), point a handgun with an extended magazine in WITNESS's direction.

2. WITNESS then began to follow the Toyota while contacting law enforcement to report the incident and the location of the Toyota. While following the Toyota, WITNESS heard what he believed to be multiple gunshots coming from the direction of the Toyota. WITNESS subsequently lost sight of the Toyota.

3. Shortly thereafter, law enforcement responding to WITNESS's call came upon a motor vehicle crash involving the Toyota and another vehicle ("VEHICLE-2") in the vicinity of the Chestnut Homes complex. While canvassing for the driver of the Toyota, law enforcement observed VEGA exit the rear yard of a nearby residence and engaged in a foot pursuit that terminated in a nearby building. While law enforcement instructed VEGA to get on the ground, VEGA repeatedly stated "they robbed my car." Law enforcement placed VEGA under arrest.

4. Law enforcement recovered a .40 caliber handgun, bearing serial number XD312433, with an extended magazine and loaded with approximately six (6) rounds of ammunition (the "Firearm") from the driver's floor board, near the pedals of the Toyota. Law enforcement also recovered a spent shell casing from the top of the running board near the driver's door of the Toyota.

5. Law enforcement subsequently obtained surveillance footage from a gas station located in the vicinity of Monroe Street and Market Street in Passaic, New Jersey. The video depicts VEGA in the driver's seat of the Toyota with another individual ("INDIVIDUAL-1") seated in the front passenger seat of the

Toyota. At various points during the video, VEGA appears to be holding the Firearm. Approximately one minute later, another surveillance video shows the Toyota exiting the parking lot and making the left onto Market Street in front of WITNESS's vehicle.

6. On or about July 22, 2016, VEGA was sentenced in Passaic County Superior Court to a term of three (3) years' imprisonment in connection with his conviction for unlawful possession of a handgun, in violation of N.J.S.A. 2C:39-5B.

7. Before being recovered in New Jersey on or about November 25, 2019, the Firearm moved in interstate commerce.